UNITED STATES DISTRICT COURT
DISTRICT OF MINNESOTA
Criminal No. 16-257 (DWF/TNL)

UNITED STATES OF AMERICA,

Plaintiff,

v.

SUMALEE INTARATHONG, *et al.*,

Defendants.

GOVERNMENT'S MEMORANDUM IN SUPPORT OF PROPOSED SCHEDULING ORDER

The United States of America, by and through its attorneys, Andrew M. Luger, United States Attorney for the District of Minnesota, and Melinda A. Williams and Laura M. Provinzino, Assistant United States Attorneys, hereby submits this memorandum in support of the proposed scheduling order, which sets forth dates for disclosures, motions, and trial, as agreed to by the parties and pursuant to the complex case order entered in this case.

On September 27, 2016, the seventeen defendants in this case were charged with various counts of (1) conspiracy to commit sex trafficking; (2) sex trafficking by force, fraud, and coercion; (3) conspiracy to commit forced labor; (4) conspiracy to commit transportation to engage in prostitution; (5) transportation to engage in prostitution; (6) conspiracy to engage in money laundering; (7) conspiracy to use a communication facility to promote prostitution; and (8) conspiracy to commit visa fraud.

On October 19, 2016, the court granted the Government's Motion to Designate Case as Complex Under the Speedy Trial Act (Doc. No. [60]), and designated the case as "complex" within the meaning of 18 U.S.C. § 3161(h)(7)(B)(ii) (Doc. No. [81]).[1] In the order, the court noted that a separate order setting a trial date and all other pre-trial deadlines, including disclosure deadlines, motions deadlines, motion hearing, and pre-trial filings would be forthcoming. (*Id.*)

Per this Court's instruction, the government has consulted with defense counsel to jointly propose a scheduling order that will meet the needs of all parties. Given the voluminous discovery in the case, the parties respectfully propose the following dates to be included in a scheduling order in this case:

Government Disclosures: January 18, 2017

Defendant Disclosures: March 10, 2017

Motions Due: April 21, 2017

Motions Responses Due and Notice Deadline: June 16, 2017

Responsive Notice Deadline: June 23, 2017

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[1] As set forth in the government's complex case motion, the discovery materials involved in this case are voluminous and include over 45,000 pages of written materials in addition to the substantial amounts of electronic discovery in the case, which includes the results of numerous email search warrants, dozens of audio recordings, surveillance footage, and the results of the searches of numerous electronic devices, including cell phones and computers.

Motions Hearing: To be determined by Court (on or after July 24, 2017)

Trial documents and Trial: To be determined by Court
(on or after September 25, 2017)

In light of the facts above and those set forth in the complex case motion, the parties believe the proposed scheduling order is in the interest of justice and, in particular, will allow the parties time to gather, organize and produce all the relevant materials, review those materials, engage in meaningful plea negotiations, and file appropriate motions.

The government has conferred with counsel for all of the defendants whom have either made their initial appearances in the District of Minnesota or retained counsel.[2] All parties consent to the above-referenced proposed scheduling order dates. Specifically, counsel for defendants (2) Chabaprai Boonluea, (3) Noppawan Lerslurchachai, (4) Watcharin Luamseejun, (5) Pantilla Rodpholka, (6) Khanong Intharathong, (8) Andrew Flanigan, (9) Todd Vassey, (10) Thi Vu, (11) John Zbaracki, (12) John Ng, (15) Yadaporn Panngoen, and (16) Supapon Sonprasit have no objection to the proposed scheduling order.[3]

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[2] Although defendant (5) Pantilla Rodpholka has not yet made her initial appearance in the District of Minnesota, she had retained counsel. Accordingly, the government included her counsel in the scheduling order discussions.

[3] Defendants (1) Sumalee Intarathong, (7) Soysuda Siangdang, and (13) Patcharaporn Saengkham are under arrest but have not yet made initial

Dated: November 21, 2016

Respectfully Submitted,

ANDREW M. LUGER
United States Attorney

/s/ Melinda A. Williams

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Assistant United States Attorney
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BY: LAURA M. PROVINZINO
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appearances in the District of Minnesota. Two additional defendants have not yet been arrested.